

Compliance Assessment Report

Report ID:
CAR_NRW0036111

This form will report compliance with your permit as determined by an NRW officer

Site	S L Recycling Ltd	Permit Ref	ZB3593HH		
Operator/Permit holder	S L Recycling Limited				
Regime	Waste Operations				
Date of assessment	10/12/2019	Time in	10:30	Out	11:00
Assessment type	Site Inspection				
Parts of the permit assessed	Various				
Lead officer's name	Burge, Chris				
Accompanied by	Bowder, Alex				
Recipient's name/position	Steve Morgan / TCM	Date issued	19/12/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	X	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Officers Alex BOWDER and Chris BURGE attended SL Recycling Ltd at Penallta Industrial Estate 10:30 on Tuesday 10 December 2019 to carry out a site handover of permit **EPR-ZB3593HH**. Met with Technically Competent Manager Steve Morgan who accompanied the Officers around the yard and explained business processes. Weather conditions were wet at the time of the visit.

PREVIOUS CAR FORM ACTIONS

- Manage the storage heights of scrap metal piles to comply with FPMP guidance
- Infrastructure – repair any weakened areas of flooring

GENERAL OBSERVATIONS

Officers were shown the units where the non-ferrous metals are sorted. Scrap metals were separated into different waste streams and stored appropriately - housekeeping was generally good around the yard.

At the time of inspection, the height of the main scrap pile in the centre of the yard was estimated to be exceeding four metres. Although there is high turnover of this material, the site must comply with the height requirements and endeavour to put measures in place to address this.

There were small patches of diesel sheen apparent on the yard surface, however this did not seem to be emanating from vehicles on site.

VEHICLE DEPOLLUTION

There was a vehicle raised on up within the depollution bay at the time of inspection. Staff explained that vehicles liquids are drained to tanks and taken away by an authorised contractor. Batteries are stored within the correct sealable container. Tyres were stored away from flammable canisters to the west of the station.

There was a large volume of tyres stored to the east of the bay, please ensure these are removed within a reasonable time period. In this area, Officers highlighted to the site what appeared to be residual burnt material; it was said that this has been here for over 18 months.



Image 1 – showing residual fire burned material to the right of the depollution bay – taken 10/12/19

ACTION

Please remove waste material and provide transfer notes that documents the removal.

Deadline Date: 01/02/2020

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INFRASTRUCTURE

As mentioned on CAR Form **CAR_NRW0034753**, some areas of the yard surface have become exposed with the metal wiring appearing. The site must ensure all areas are restored to impermeable status to ensure everything is contained within the site's sealed system. The site stated to Officers that it intends to fully repair the surfaces when space is available.

No issues with the drainage system noted.

Officers spoke about the potential change of operations once the New Inn site is fully operational in 2020. The site stated that it intends to conduct the same activities for the meantime.

ADVISORY NOTES

- Reduce the height of stored stockpiled to four metres.
- Residual burned material from fire two year ago. Please can the site remove this material
- Repair any weakened flooring

WASTE RETURNS

Documents in the office were not inspected. The annual waste return data will be due 31 January 2020 and will be evaluated in the new year. Please ensure this document is submitted within the grace period.

If you have any issues with this report, please contact Chris Burge on 0300 065 3904 or chris.burge@cyfoethnaturiolcymru.gov.uk

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

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EPR Compliance Assessment Report

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Operator/Permit holder	S L Recycling Limited	Date	10/12/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C4	X	Please remove fire/ burnt waste material and provide transfer notes that documents the removal	01/02/2020

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. Health and Safety Executive, local authorities) on environmental issues
- Carrying out statistical analysis, research and development on environmental issues
- Providing public register information to enquirers
- Investigating possible breaches of environmental law
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.